

**Douglas L. Patch**  
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**Orr&Reno**  
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February 9, 2009

Thomas S. Burack, Chairman  
NH Site Evaluation Committee  
c/o NH Department of Environmental Services  
29 Hazen Drive, P.O. Box 95  
Concord, NH 03302-0095

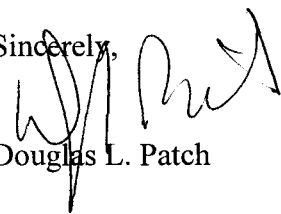
Re: Docket No. 2008-04 - Application of Granite Reliable Power, LLC for a  
Certificate of Site and Facility for the Granite Reliable Power Wind Park in Coos County

Dear Chairman Burack:

Enclosed please find the Objection of Granite Reliable Power, LLC, the Applicant in the above-captioned matter, to the Motion of Counsel for the Public to Suspend Deliberations and Proceedings and the Request of Counsel for the Public for Emergency Hearing on Motion to Suspend Deliberations and Proceedings dated February 5, 2009.

Thank you for your cooperation. Please let me know if you have any questions.

Sincerely,

  
Douglas L. Patch

cc: Subcommittee Chairman Thomas B. Getz  
Subcommittee Counsel Michael J. Iacopino  
Service list in SEC Docket No. 2008-04

Enclosure

536686\_1.DOC

**STATE OF NEW HAMPSHIRE**  
**SITE EVALUATION COMMITTEE**

**Docket No. 2008-04**

**RE: APPLICATION OF GRANITE RELIABLE POWER, LLC  
FOR A CERTIFICATE OF SITE AND FACILITY  
TO CONSTRUCT AND OPERATE  
THE GRANITE RELIABLE POWER WINDPARK**

**APPLICANT'S OBJECTION TO MOTION OF COUNSEL FOR THE PUBLIC TO  
SUSPEND DELIBERATIONS AND PROCEEDINGS AND REQUEST OF COUNSEL  
FOR THE PUBLIC FOR EMERGENCY HEARING ON MOTION TO SUSPEND  
DELIBERATIONS AND PROCEEDINGS**

NOW COMES Granite Reliable Power, LLC ("GRP" or "the Applicant") by and through its undersigned attorneys and objects to the Motion of Counsel for the Public to Suspend Deliberations and Proceedings ("the Motion") and Request of Counsel for the Public for Emergency Hearing on Motion to Suspend Deliberations and Proceedings ("the Request") in the above-captioned matter, both dated February 5, 2009, by stating as follows:

1. In the Motion, Public Counsel has asked the New Hampshire Site Evaluation Committee ("the Committee") to enter an order postponing the proceeding in the above-captioned matter "until such time as the Applicant provides the Committee definite prefiled testimony supported by documentation demonstrating that it then actually has sufficient financial capability to finance the construction and operation of the Project..." In support of his Motion, Public Counsel cites a statute that gives the Committee the authority to "suspend its deliberations and enlarge the time frame established under this section to issue or deny a certificate." Read literally, this statute only gives the Committee the authority to suspend its deliberations; since

those deliberations have not begun and will not begin until the hearing is complete, the statute does not support the request that he has made. The Applicant objects to the Motion by stating that it has already provided pre-filed testimony on this issue and that, in accordance with the orders of the Committee, it intends to supplement what has been provided. The Motion and the Request are therefore unwarranted and premature.

2. The Applicant submitted the Application on July 15, 2009. The Application included all of the information required by Site 301.03 and RSA 162-H, including the pre-filed testimony of Christopher Lowe, the Chief Financial Officer of Noble, and the financial information required by the law and rules. The Chairman of the Committee conducted a preliminary review of the Application as required by law and determined that “the Application is found to contain sufficient information for the purposes of RSA 162-H” and accepted the Application. See *Order Accepting Application for Certificate of Site and Facility and Designating a SubCommittee Pursuant to RSA 162-H:6-a* dated August 14, 2008. Subsequently, pursuant to an August 27, 2008 Order of the Committee, the parties, including Public Counsel, attended a prehearing conference on September 18, 2008, and agreed to a schedule that the Committee accepted. See *Report of Prehearing Conference* dated September 26, 2008. That Report contained a schedule, which, as it notes, was agreed to by the parties, including Public Counsel, which provided for the submission and responses to data requests, the submission of pre-filed testimony by “Intervenors and Public Counsel”, and, later in the schedule, the submission of supplemental testimony “from all parties”.

3. In accordance with the procedural schedule, the Applicant has responded to approximately 500 data requests, including four rounds of data requests from Public Counsel, either submitted in writing or propounded orally at the scheduled technical sessions. On

November 7, 2008, Public Counsel submitted to the Committee a request to obtain certain specific consultants, with which the Applicant concurred. Public Counsel did not ask for a financial consultant at that time. In response to requests from Public Counsel and other parties, the Committee modified the dates for submission of testimony by “Intervenors and Public Counsel” (January 5, 2008), while the date for submission of supplemental pre-filed testimony “from all parties” remained the same (i.e. February 23, 2009). See *Order Approving Payment of Consultant, Granting Confidentiality and Revising Procedural Schedule* dated December 8, 2008. The Intervenors and Public Counsel submitted pre-filed testimony on January 5, 2009, none of which raised issues about the financial capability of the Applicant. Public Counsel filed no testimony regarding financial issues by the January 5, 2009 deadline imposed by the Committee.

4. In accordance with the procedural schedule agreed to by the parties and ordered by the Committee, the Applicant intends to file supplemental testimony by February 23, 2009. The submission of supplemental testimony and filings by the Applicant is common practice in proceedings before this Committee. Moreover, the Applicant’s ability to file rebuttal testimony is expressly authorized by the Committee’s rules. See Admin. Rule Site 202.22(b). The Applicant’s supplemental/rebuttal testimony will provide additional updated information to the parties and the Committee on a number of issues, including financial matters, before the hearings begin. Public Counsel’s Motion is thus premature, as the agreed-to schedule has not been allowed to run its course.

5. Public Counsel indicates in his Motion that he was not satisfied with some of the Applicant’s responses to data requests. If so, his remedy is not a suspension of these proceedings; rather, it is a motion to compel, a filing which Public Counsel did not make.

6. Public Counsel further indicates that in response to an oral request from Public Counsel, the Applicant agreed to make Mr. Lowe available to Public Counsel for a telephone conference call, which the Applicant did do. Public Counsel is correct that Mr. Lowe had to postpone the first scheduled time for this call. What Public Counsel fails to disclose is that the Applicant rescheduled that call for a time two days later, which Public Counsel cancelled at the last minute. The Applicant has attempted a number of times both by email and orally to reschedule the call. *See* Attachment A, string of emails. Public Counsel has not responded to those offers. Instead, Public Counsel has chosen to file the Motion.

7. The questions that Public Counsel included in the email which he attached to the Motion, were never propounded on the Applicant as data requests and were not propounded within the schedule adopted by the Committee. These questions were prepared in response to a request by the Applicant for some indication of what Public Counsel wanted to discuss with Mr. Lowe by phone. As noted above, Public Counsel failed to take the Applicant up on the offer to reschedule the call with Mr. Lowe.

8. Public Counsel indicated at the technical session in December that he might want to retain a financial consultant. See the email dated December 29, 2008, Attachment B to the Motion, in which he says: "I'm also considering the retention of a financial consultant under 162-H:10 V." When the Applicant met with Public Counsel on January 22, 2009 and discussed this, among other issues, Public Counsel asked if the Applicant would support his request. Later that day the undersigned counsel left Mr. Roth a phone message asking him to call to discuss this further. Mr. Roth did not return the call. Undersigned counsel therefore sent an email on January 28, 2009, a copy of which is Attachment B to this Objection, indicating that the Applicant could support this request with certain conditions. Mr. Roth never responded with

either a phone call or an email. Public Counsel has: had the Application since July 15; known since September that the schedule in this docket allows for supplemental testimony; had since early November the responses to the four rounds of data requests that he propounded to the Applicant; submitted a request on November 7, 2008 asking for consultants, but did not ask for a financial consultant; submitted testimony on January 5, 2009 that did not address the financial capability issue; and yet despite all of this, has chosen to wait until now to raise this issue, all to the potential disadvantage of the Applicant and the disruption of the schedule laid out in the statute. The Applicant should not be made to suffer and to lose the time frames spelled out in the law, and the schedule agreed to by the parties, because Public Counsel has been recalcitrant and/or tardy in deciding how he wants to address certain issues in this proceeding.

9. The Applicant has the burden of proving, among other things, that it “has adequate financial ...capability to assure construction and operation of the facility in continuing compliance with the terms and conditions of the certificate”. See Admin. Rule Site 202.19(b); RSA 162-H:16, IV(a). The Applicant understands and accepts this burden and believes that the information it has already provided, with the updates that will be included in the supplemental pre-filed testimony, will demonstrate that it meets that burden. However, the decision as to whether the Applicant has met its burden of proof is for the Committee to make after reviewing all of the evidence. Thus, the Committee should not adopt Public Counsel’s premature, unilateral determination regarding Applicant’s financial capabilities as the basis for suspending or otherwise delaying the instant proceedings.

10. The siting process under RSA 162-H is designed to be an iterative process; neither RSA 162-H nor the Committee’s rules compel the production of all record evidence on the date the application is filed. Contrary to paragraph 12 of the Motion, an applicant is not

required to submit “all” pre-filed testimony with its application. Rather, Admin. Rule Site 301.05(b) and RSA 162-H:6-a, II contemplate that an application, at the time of filing, contain enough information as is necessary for review. This is akin to the burden of production (which must be met in order for the Committee to move forward with the review process); it is not commensurate with the burden of proof (which must be met in order for the Committee to issue a certificate of site and facility). Public Counsel, in his prayer for relief, asks that the Committee postpone the proceeding “until such time as the Applicant provides the Committee definite prefiled testimony supported by documentation demonstrating that it then actually has sufficient financial capability to finance the construction and operation of the Project”. As noted above, because the Applicant has the opportunity to supplement its testimony on February 23, 2009, Public Counsel has acted prematurely and has unnecessarily complicated the process by filing the Motion and by not allowing the process to run its course.

11. In addition to the procedural reasons for denying the Motion, there are substantive reasons for rejecting Public Counsel’s argument concerning the Applicant’s financial capabilities. Nowhere in the Motion does Public Counsel take note of the fact that Noble Environmental Power has successfully financed and constructed other wind energy facilities in the United States. Despite Noble’s proven track record with respect to other wind energy facilities, Paragraph 10 of the Motion alleges “that the Applicant does not have adequate financial capability to construct and operate the Project.” The remainder of that paragraph reflects a basic misunderstanding of project financing-- it implies that both the Applicant and Noble Environmental Power must possess “cash” and/or other resources “in hand” at this time in order to assure the construction and operation of the project at some time in the future. Public Counsel implies that the Applicant must have financing in place before April 6, 2009 (Motion at

Paragraph 9) and that the Applicant must have a “firm arrangement to finance the Project...in place prior to the date by which the Committee is required to make a decision to issue or deny a certificate” (Motion at Paragraph 11). This also reflects a basic misunderstanding about project financing and fails to recognize that other projects have not had financings finalized at the time of certification by the Committee. As this Committee has recognized, “the financing of electric power generation facilities can be complex and difficult. Large electric generation projects are expensive and implicate numerous permitting, regulatory and safety concerns...” Docket No. 2004-01, *Decision and Order* dated October 27, 2004 regarding the *Joint Application of AES Londonderry, L.L.C. and ABN AMRO Bank, N.V., as Agent, for Approval to Transfer Equity Interests in AES Londonderry, L.L.C. Under RSA 162-H*, at page 8. In that docket the Committee recognized the “willingness” of lenders to extend additional funds toward the completion, maintenance and operation of the facility, even though the operating funds were not guaranteed. *See also* SEC Docket 98-01, *Decision* regarding Newington Energy, L.L.C., dated May 25, 1999, where the Committee recognized, at page 11, that the Applicant “seeks to finance \$185 million of the proposed project and estimates that an additional \$120 million will be necessary to complete construction” and further noted that the Applicant “has made a considerable investment in the project to date and based upon its representations appears to be ready to continue to make substantial contributions to and investments in the Applicant and its proposed facility.” Thus, the Committee has accepted proof of financial responsibility in other proceedings that is far different than what Public Counsel suggests.

12. GRP respectfully notes that there have been significant disruptions in international capital markets which have impacted the availability of debt, tax equity and equity, all of which will be sources of finance for this project. As the Committee is aware, federal



legislation is currently moving through Congress which may and should positively impact the availability of capital for renewable energy projects. It is GRP's intention to demonstrate through supplemental testimony that the windpark possesses the characteristics that would attract capital in normalized financing markets, thus allowing GRP to demonstrate that it "has adequate financial capability to assure construction and operation of the facility in continuing compliance with the terms of the certificate."

13. GRP respectfully notes that there is no "emergency" and therefore no need for an "emergency hearing" as Public Counsel has requested. The process is working in accordance with the schedule established by the Committee pursuant to the time frames in RSA 162-H:6-a, and that schedule should be allowed to continue. RSA 162-H:1, I provides that "the public interest requires" that "undue delay in construction of any needed facilities be avoided". RSA 162-H:1, II also says: "electric power supplies must be constructed on a timely basis". Granting the Motion would cause undue and unnecessary delay in the proceeding. Renewable energy facilities are needed to comply with RPS requirements and it is "in the public interest to stimulate investment in low emission renewable energy generation technologies in New England and, in particular, New Hampshire." RSA 362-F:1. In 2007, in the law that provided a more compact process for the review of renewable energy facilities, the Legislature made this statement: "It is in the public interest and to the benefit of New Hampshire to encourage the development of renewable energy." Chapter 364, Laws of 2007, Section 1. The schedule that the Committee has established is consistent with the law and the Committee rules, as well as the prior practice of this Committee. It is also consistent with the Administrative Procedures Act, which provides: "Opportunity shall be afforded all parties to respond and present evidence and argument on all issues involved." RSA 541-A:31,IV.

14. Public Counsel's Motion and Request violate Admin. Rule Site 202.14(d) and (e) in that he did not seek to obtain the concurrence of any of the parties to this proceeding. For that reason, they should be denied.

15. While RSA 162-H:6-a, IX does give the Committee the authority to suspend its deliberations if it is in the public interest, the Applicant submits, for the reasons detailed above, that it would not be in the public interest for the Committee to grant either the Motion or the Request. Moreover, granting either the Motion or the Request would not promote the orderly and efficient conduct of the proceeding. *See* Admin. Rule Site 202.16(c).

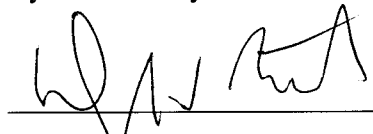
Wherefore, the Applicant respectfully requests that the Presiding Officer:

- A. Deny the request for an emergency hearing;
- B. Deny the request to suspend the deliberations and proceedings; and
- C. Grant such other relief as may be just and equitable.

Respectfully submitted,

Granite Reliable Power, LLC

By Its Attorneys

A handwritten signature in black ink, appearing to read 'Douglas L. Patch', is written over a horizontal line.

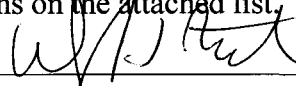
Douglas L. Patch  
Orr & Reno, P.A.  
One Eagle Square  
Concord, N.H. 03302-3550  
(603) 223-9161  
Fax (603) 223-9061  
dlp@orr-reno.com

Dated: February 9, 2009

Certificate of Service

I hereby certify that, on the date written below, I caused the within Objection to be sent by electronic mail or U.S. mail, postage prepaid, to the persons on the attached list.

2/9/09  
Date

  
Douglas L. Patch

536569\_1.DOC

Attachment A

**Patch, Douglas L.**

---

**From:** Patch, Douglas L.  
**Sent:** Monday, January 05, 2009 3:55 PM  
**To:** 'Roth, Peter'; Michael J. Iacopino; Lisa Linowes  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** RE: Call regarding Financing Questions

These are things we could explain on the call – do you want to do it this PM ?

---

**From:** Roth, Peter [mailto:Peter.Roth@doj.nh.gov]  
**Sent:** Monday, January 05, 2009 3:49 PM  
**To:** Patch, Douglas L.; Michael J. Iacopino; Lisa Linowes  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** RE: Call regarding Financing Questions

With respect to the unavailable financials does this include the balance sheet that was provided for granit Reliable also?

And maybe this is rhetorical...how will you get anyone to finance the project if your financials are not up to date?

Peter C.L. Roth  
Senior Assistant Attorney General  
State of New Hampshire  
Office of the Attorney General  
33 Capitol Street  
Concord, New Hampshire 03301  
603.271.1270  
fax: 603.223.6269

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-----Original Message-----

**From:** Patch, Douglas L. [mailto:DPatch@orr-reno.com]  
**Sent:** Monday, January 05, 2009 3:44 PM  
**To:** Roth, Peter; Michael J. Iacopino; Lisa Linowes  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** RE: Call regarding Financing Questions

Peter,  
As I indicated in the email I sent this morning, no updated financials (beyond the first three quarters of 2008 which you already have) will be available until March. We still think it would enhance your understanding to have the call so that Chris Lowe can explain aspects of project finance that would be of benefit to you and he can try to answer as many of your other questions as possible. Let us know how you want to proceed.

2/7/2009

Doug

---

**From:** Roth, Peter [mailto:Peter.Roth@doj.nh.gov]  
**Sent:** Monday, January 05, 2009 3:37 PM  
**To:** Michael J. Iacopino; Patch, Douglas L.; Lisa Linowes  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** RE: Call regarding Financing Questions

Sorry if there was some confusion. I really need to see the updated financials before we proceed.

Thanks

Peter C.L. Roth  
Senior Assistant Attorney General  
State of New Hampshire  
Office of the Attorney General  
33 Capitol Street  
Concord, New Hampshire 03301  
603.271.1270  
fax: 603.223.6269

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-----Original Message-----

**From:** Michael J. Iacopino [mailto:MIacopino@bclilaw.com]  
**Sent:** Monday, January 05, 2009 3:00 PM  
**To:** Patch, Douglas L.; Lisa Linowes; Roth, Peter  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** RE: Call regarding Financing Questions

Folks,

Since its 3 pm now I assume that this conference call is not happening today. If I am mistaken please call me on my cell phone 496-4455. Thanks,

Mike

Michael J. Iacopino  
Brennan Caron Lenehan & Iacopino  
85 Brook Street  
Manchester N.H. 03104

(603) 668-8300  
(603) 496-4455 (cell)  
(603) 668-1029 (fax)

2/7/2009

[miacopino@bclilaw.com](mailto:miacopino@bclilaw.com)  
[www.bclilaw.com](http://www.bclilaw.com)

---

**From:** Patch, Douglas L. [mailto:DPatch@orr-reno.com]  
**Sent:** Monday, January 05, 2009 2:38 PM  
**To:** Lisa Linowes; Roth, Peter; Michael J. Iacopino  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** RE: Call regarding Financing Questions

I have not heard back from Peter, so I am assuming that he is not ready to do the call unless I hear otherwise.

---

**From:** Lisa Linowes [mailto:lisa@linowes.com]  
**Sent:** Monday, January 05, 2009 2:35 PM  
**To:** Patch, Douglas L.; Roth, Peter; Michael J. Iacopino  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** Re: Call regarding Financing Questions

Doug, is this meeting happening today? and does the call-in information you provided last week still apply?

I have not had a chance to review the numbers in depth, but plan to attend.

--Lisa

----- Original Message -----

**From:** Patch, Douglas L.  
**To:** Roth, Peter ; Michael J. Iacopino ; [lisa@linowes.com](mailto:lisa@linowes.com)  
**Cc:** Pip Decker ; Mark Lyons  
**Sent:** Monday, January 05, 2009 10:18 AM  
**Subject:** RE: Call regarding Financing Questions

Peter,

It is my understanding that year-end financials will not be available until March. Do you want to do the call at 3PM today ?

Doug

---

**From:** Roth, Peter [mailto:Peter.Roth@doj.nh.gov]  
**Sent:** Friday, January 02, 2009 11:02 AM  
**To:** Patch, Douglas L.; Michael J. Iacopino; [lisa@linowes.com](mailto:lisa@linowes.com)  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** RE: Call regarding Financing Questions

Yes, if I can get updated financials today.

Peter C.L. Roth  
Senior Assistant Attorney General  
State of New Hampshire  
Office of the Attorney General  
33 Capitol Street  
Concord, New Hampshire 03301  
603.271.1270

fax: 603.223.6269

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-----Original Message-----

**From:** Patch, Douglas L. [mailto:DPatch@orr-reno.com]  
**Sent:** Friday, January 02, 2009 11:00 A M  
**To:** Roth, Peter; Michael J. Iacopino; lisa@linowes.com  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** RE: Call regarding Financing Questions

Can we do the call Monday at 3PM ?

---

**From:** Roth, Peter [mailto:Peter.Roth@doj.nh.gov]  
**Sent:** Friday, January 02, 2009 10:53 A M  
**To:** Patch, Douglas L.; Michael J. Iacopino; lisa@linowes.com  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** RE: Call regarding Financing Questions

I would like to postpone this call until monday.

I'm sorry for the late notice but I need the time.

I also hope that you can work out somethibng so Ms. Linowes can see the materials she's asking for.

Peter

Peter C.L. Roth  
Senior Assistant Attorney General  
State of New Hampshire  
Office of the Attorney General  
33 Capitol Street  
Concord, New Hampshire 03301  
603.271.1270  
fax: 603.223.6269

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2/7/2009

-----Original Message-----

**From:** Patch, Douglas L. [mailto:DPatch@orr-reno.com]  
**Sent:** Friday, January 02, 2009 10:28 AM  
**To:** Roth, Peter; Michael J. Iacopino; lisa@linowes.com  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** RE: Call regarding Financing Questions

Here is the call in number for our 11AM call this morning:

888-887-0127

Bridge is 348379.

---

**From:** Roth, Peter [mailto:Peter.Roth@doj.nh.gov]  
**Sent:** Friday, January 02, 2009 10:16 AM  
**To:** Patch, Douglas L.; Michael J. Iacopino; lisa@linowes.com  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** RE: Call regarding Financing Questions

ok

Peter C.L. Roth  
Senior Assistant Attorney General  
State of New Hampshire  
Office of the Attorney General  
33 Capitol Street  
Concord, New Hampshire 03301  
603.271.1270  
fax: 603.223.6269

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-----Original Message-----

**From:** Patch, Douglas L. [mailto:DPatch@orr-reno.com]  
**Sent:** Friday, January 02, 2009 10:13 AM  
**To:** Roth, Peter; Michael J. Iacopino; lisa@linowes.com  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** RE: Call regarding Financing Questions

How about 11AM today ? I just talked to Mike Iacopino and he is available.

---

**From:** Roth, Peter [mailto:Peter.Roth@doj.nh.gov]



**Sent:** Friday, January 02, 2009 9:56 AM  
**To:** Patch, Douglas L.; Michael J. Iacopino; lisa@linowes.com  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** RE: Call regarding Financing Questions

yes.

Peter C.L. Roth  
Senior Assistant Attorney General  
State of New Hampshire  
Office of the Attorney General  
33 Capitol Street  
Concord, New Hampshire 03301  
603.271.1270  
fax: 603.223.6269

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-----Original Message-----

**From:** Patch, Douglas L. [mailto:DPatch@orr-reno.com]  
**Sent:** Wednesday, December 31, 2008 2:11 PM  
**To:** Roth, Peter; Michael J. Iacopino; lisa@linowes.com  
**Cc:** Pip Decker; Mark Lyons  
**Subject:** Call regarding Financing Questions

Would it be possible to schedule a time on Friday (January 2nd) to do a call to answer your questions on finance issues ? Thanks.

**Douglas L. Patch**

**Orr&Reno**



One Eagle Square, P.O. Box 3550  
Concord, NH 03301  
Phone: 603.224.2381  
Direct Ext: 603.223.9161  
Fax: 603.223.9061  
[www.orr-reno.com](http://www.orr-reno.com)

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2/7/2009

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Attachment B

**Patch, Douglas L.**

---

**From:** Patch, Douglas L.  
**Sent:** Wednesday, January 28, 2009 3:00 PM  
**To:** Roth, Peter  
**Cc:** Geiger, Susan S.  
**Subject:** Follow Up

Peter,

After our meeting last Thursday, I left you a voicemail indicating that I wanted to talk further with you about your request for a financial consultant. Since I have not heard back from you I wanted to let you know Granite Reliable Power's position on this. GRP would support a request by you to obtain a financial consultant for up to \$10,000 for the purpose of advising you on financial issues. GRP would not support having that consultant submit testimony given where we are in the proceeding. Please let me know if you want to discuss further. Thanks.  
Doug

**Douglas L. Patch**

**Orr&Reno**

One Eagle Square, P.O. Box 3550  
Concord, NH 03301  
Phone: 603.224.2381  
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